



*Consulting Engineers
and Scientists*

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December 23, 2010
(PBW Project No. 1597)

VIA FEDERAL EXPRESS

Mr. Gary Miller
Superfund Division, Region 6 (6SF-RA)
Arkansas/Texas Section
U.S. Environmental Protection Agency
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Ms. Rita Engblom, On-Scene Coordinator
U.S. Environmental Protection Agency, Region 6
Superfund Division (6SF-AP)
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Re: Transmittal of Name and Qualifications for Trucking Subcontractor - Removal Action,
Gulco Marine Maintenance Site, Freeport, Texas

Dear Mr. Miller and Ms. Engblom:

Pursuant to Paragraph 33 of the Administrative Settlement Agreement and Order on Consent for Removal Action, effective October 29, 2010, for the above-referenced Site, Pastor, Behling & Wheeler, LLC (PBW), on behalf of LDL Coastal Limited LP (LDL), Chromalloy American Corporation (Chromalloy) and The Dow Chemical Company (Dow), herewith provides the name and stated qualifications (provided in Attachment A to this letter) of Action Resources, Inc. (ARI), a trucking subcontractor to the primary removal action subcontractor, Effective Environmental, Inc. (EEI).

Thank you for the opportunity to submit this information. Should you have any questions, please do not hesitate to contact me.

Sincerely,

PASTOR, BEHLING & WHEELER, LLC

Eric F. Pastor, P.E.
Principal Engineer

Mr. Gary Miller and Ms. Rita Engblom

December 23, 2010

Page 2

cc: Mr. Ray Merrell – Sequa Corporation
Mr. Brent Murray – Environmental Quality, Inc.
Mr. Donnie Belote - The Dow Chemical Company
Mr. Allen Daniels - LDL Coastal Limited, LP
Mr. F. William Mahley - Strasburger & Price, LLP
Mr. James C. Morriss III - Thompson & Knight, LLP
Ms. Elizabeth Webb - Thompson & Knight, LLP
Mr. Greg Blomquist – EEI
Mr. Tony Maag - EEI

ATTACHMENT A

ACTION RESOURCES, INC. QUALIFICATIONS SUMMARY

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ACTION RESOURCES, INC. (ARI) QUALIFICATIONS SUMMARY

ARI's stated qualifications are summarized as follows:

ARI provides transportation services throughout the U.S. and Canada. Founded in 1995, ARI operates a large fleet of well maintained, late model equipment that is especially designed to haul hazardous and non-hazardous waste. ARI's safety record is among the best in the industry.

All ARI tractors are less than 4 years old and each is satellite equipped to provide up to the minute communication and tracking of shipments. All equipment is routinely serviced and updated ensuring prompt, dependable deliveries. ARI's fleet of trucks and equipment includes:

- Chemical Tanks
- Vacuum Tanks
- Dump Trailers
- Roll-off Containers
- Water-tight Sludge Containers
- Vacuum Containers
- Metal Lids and Roll-over Tops
- 48' and 53' Van Trailers
- Spill Pans and Spill Kits
- Flatbeds and Lowboys